

## O'Tormey, Sean P (FAA)

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**From:** Reaves, David (FAA)  
**Sent:** Wednesday, November 10, 2021 8:34 AM  
**To:** randers@skycrane.us  
**Cc:** O'Tormey, Sean P (FAA)  
**Subject:** Request for Information # 2 - Kona Drone Service LLC, (Docket FAA-2021-0921) - response required by November 23, 2021

Mr. Ray Anders  
Kona Drone Service LLC  
75-5503 Mamalahoa Highway  
Holualoa, HI 96725

Mr. Anders:

This email is to inform you that the following information is required to continue processing your petition for exemption for Kona Drone Service, LLC, Docket FAA-2021-0921. We request you provide the following information to us no later than November 23, 2021:

1. Thank you for clarifying that you mean to point to similarities in Exemption No. 18799 (Rocoza, LLC) in your petition for exemption. Please be advised that the Rocoza, LLC exemption was based upon it's similarity to Exemption No. 18009 (Powers): "In Grant of Exemption No. 18009 (copy enclosed), the FAA found that a grant of exemption...". Petitioners who have been issued similar grants of exemption to No. 18009 have provided an equivalent level of safety through a comprehensive flight operations and procedures manual, a comprehensive training and certification program, and a comprehensive operational risk and safety manual. Therefore, your petition for exemption must be similar in all aspects to 18009, otherwise, we must consider your petition as precedent setting. Please clarify your request.
2. Because we are assuming your petition will be based on Powers (see Exemption No. 18009), and because petitioners who have been issued similar grants of exemption to No. 18009, have all included, as part of their risk mitigation strategy the following documents, we again request you provide the following:
  - A comprehensive training and certification program. Petitioners who have been issued similar grants of exemption (see Exemption No. 18009) have provided a comprehensive training and certification program. Your operator's training program should be a comprehensive training course tailored for the proposed operations that includes theory and practical components, a pilot theory exam, and supervised operational familiarization training on agricultural spraying. Additionally, the training program requirements should include examination, flight test, and continued periodic training. Should you choose not to provide this documentation, please confirm if you want the FAA to consider your petition based upon use of check lists only.
  - A comprehensive operational risk and safety manual containing a detailed risk analysis specific to your operation. The information you provided in response to our first RFI is not a suitable alternative means of compliance because it does not provide an equivalent level of safety to the exempted regulations. It is not an operational risk and safety manual similar to that provided by petitioners who have been issued similar grants of exemption (see Exemption No. 18009). The operational risk and safety manual should identify risks specific to your operation, provide procedures to mitigate those risks, and determine whether the residual risk level is acceptable. Please provide an updated manual.

- Thank you for providing your Operations and Procedures Manual. The information you provided in response to our first RFI is not a suitable alternative means of compliance because it does not provide an equivalent level of safety to the exempted regulations. The flight operations and procedures manual should include flying procedures, pre-and post-flight procedures (yours does), and emergency procedures. Please provide an updated manual.

Please submit the additional information (non-proprietary) as a comment to your docket at [www.regulations.gov](http://www.regulations.gov), and save the tracking number generated after submission. Proprietary information may be submitted electronically to David Reaves at [david.reaves@faa.gov](mailto:david.reaves@faa.gov) and Sean O'Tormey at [sean.p.o'tormey@faa.gov](mailto:sean.p.o'tormey@faa.gov).

If you want us to process your request any further, we must receive the information described above by November 23, 2021. If we do not receive the information, we will close the docket without notifying you further. If you have any questions or require additional time you may email us or call (717) 473-0231. Thank you.

Sincerely,



*David Reaves*

Aviation Safety Inspector  
Operations Group | AFS-830

Flight Standards Service  
800 Independence Ave, SW  
Washington, DC 20591  
Text | Phone (717) 473-0231

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